



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

December 18, 1997

**VIA FACSIMILE & FIRST-CLASS MAIL**

Benjamin L. Ginsberg, Esq.  
Patton Boggs, L.L.P.  
2550 M St., N.W.  
Washington, D.C. 20037-1350

RE: MUR 3774  
National Republican Senatorial Committee and  
Stan Huckaby, as treasurer  
Curt Anderson

Dear Mr. Ginsberg:

As we discussed, enclosed is a copy of the November 26, 1997 article from The Hill that describes a 1992 National Republican Senatorial Committee ("NRSC") Coalition Building Manual reportedly written by Curt Anderson. This document appears to be relevant to the investigation in MUR 3774 but was not among the documents produced by the NRSC in response to the Commission's subpoenas nor was it produced by Curt Anderson pursuant to the Commission's February 12, 1997, subpoena to him. Since you now represent both Mr. Anderson and the NRSC in this matter, I would appreciate it if you could check with both of them to determine whether this document was overlooked in their respective searches for responsive documents. If so, please produce a copy of the manual, or otherwise respond to this request, prior to the close of business on December 30, 1997.

Thank you for your prompt attention to this matter. Please contact either me or Mary Ann Bumgarner at (202) 219-3400 if you have any questions.

Sincerely,

*Dawn M. Odrowski*  
Dawn M. Odrowski  
Attorney

# The Hill

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clothes from House and Senate offices as honorary  
Hill Charity Drive Monday.

## GOP urged Hill staffers to aid campaigns

By Robert Schlesinger

While congressional rules prohibit the use of government resources for campaign activities, recent GOP campaign materials appear to blur that legal firewall.

The documents, acquired during Sen. Fred Thompson's (R-Tenn.) Governmental Affairs Committee's campaign finance investigations, provide a rare glimpse into the "coalition building" strategy that modern campaigns employ to harness the assistance of like-minded nonprofit groups.

One of the most striking documents is a National Republican Senatorial Committee (NRSC) Coalition Building Manual which advocates "sensitizing" congressional staff to the needs of the campaign — in apparent contravention of Senate rules.

The manual was promulgated in 1992, but appears to have been in use as recently as last year.

One section in the manual, "Making Interest Groups Work for You — Sensitizing Your Legislative Staff," details how a senator's congressional staff can work with outside groups: "... as you get closer to the election, your legislative staff needs to view these contacts [with interest and constituent groups] ... as opportunities to gain electoral support," the manual says.

Senate ethics rules expressly forbid the use of congressional staff for electoral purposes.

The booklet notes that, "... it is important to maintain a list of groups who successfully lobbied for your support. As Election Day approaches, you can then turn the tables on them and have your campaign solicit their assistance. ... It is equally important that your staff knows what to ask for from various groups that can assist you, and that it be clear which staffer has the responsibility for seeing that the proper follow-up occurs."

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## Globe-trotting lawmakers mix diplomacy and tourism

By Sandy Hume

The congressional recess has sent members and staffers to the four corners of the globe, to a range of locations from China to Saudi Arabia, and from Ireland to Russia.

Congressional delegations (Codels) have long been criticized by watchdog groups as junkets cherished by members, who consider them indispensable for informed decisions on foreign policy. And offices contacted by The Hill regarding the latest

spate of Codels described them as packed with official activity.

But their popularity during this recess, suggested one House member, stemmed from the fact that campaign seasons are both more busy and more delicate; "Time is short and you also don't want to get rapped in the local paper during a campaign for taking a trip overseas," the member said.

Several of the trips began the day after Congress concluded its business on Nov. 13. Five members are required for House-

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# NRSC urged Hill staffers to aid campaigns

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The manual states early on that "your coalition building efforts should concentrate on getting you three things you need most of money, media and votes."

Another early section of the manual, "Conducting an Inventory," echoes use of congressional staff for this purpose. "For incumbents this task can be relatively simple. If the state and Washington staffs are assigned the task of filling out profile sheets on constituent groups whose support will get us votes, media or money, it can be accomplished in short order." The manual provides sample profile sheets.

According to the Senate Ethics Manual, "congressional employees receive publicly funded salaries for performance of official duties, and, therefore, campaign or other non-official activities should not take place on Senate time, using Senate equipment or facilities."

In a section entitled "Mailing Lists," the Ethics Manual further elaborates: "Mailing lists procured, compiled, maintained or produced with appropriated funds (such as staff salary) may be used only for official purposes."

NRSC spokesman Mike Russell denied any impropriety. "I wouldn't read the [coalition] manual that way," he said. He added, "The way I would read that is, be aware of what these organizations are doing to educate the electorate and turn people out. Being informed on the issues is not a crime, and that's really all it's suggesting they do."

But Bill Hogan of the nonpartisan Center for Public Integrity wondered how

the interest-group profiles are transferred from congressional to campaign staff.

"It's almost in black and white that you would be using some resource put together at public expense for a campaign purpose. The key to me is maintain a list. This seems to me kind of a methodical effort to keep track of groups that were somehow supportive of legislation or something else a senator worked on, and then at reelection time to go after those groups," he said.

**Coalition guidelines provide a glimpse into strategy behind national campaigns**

He added, "This really is sort of 'Senators: Your Taxpayer-Financed Employees to do Political Work For You,' and that's what I think the average person would find objectionable."

NRSC's Russell noted that the manual promulgated by then-NRSC staffer Curt Anderson, during the 1992 election cycle, when Sen. Phil Gramm (R-Texas) chaired the committee, was not used in the last election, and he did not know whether it would be used during the 1998 elections.

Nevertheless, a Republican National Committee (RNC) memo on coalition building dated October of last year from Anderson to then-Chairman Haley

Barbour suggests that the manual was then still in use. Referring to a course on coalition planning that he taught at the GOP Campaign Management College, Anderson wrote that "I hand out sample plans and a manual for referral (attached)."

Anderson did not return phone calls for comment.

RNC spokesman Clifford May said he did not know whether it was the same manual.

The coalition guidelines provide a rare glimpse into the strategy behind national campaigns. "One of the goals of any good coalition program is to increase your vote total by breaking out of the Republican box," the booklet states, emphasizing that "What we say about ourselves is suspect, but what others say about us is credible."

The guidelines stress the importance of winning group endorsements and access to their mailing lists. The booklet notes in the case of endorsements, "We urge you to work with the NRSC on this process, particularly with the national groups, as we have a good historical knowledge of the different pressure points with many of these organizations."

The larger issue raised is that of party coordination with outside, nonprofit groups. Anderson's coalition memorandum to Barbour, which lists conservative organizations like the Christian Coalition and National Right to Life (NRTL), says, "While it has always been true that our coalition groups need direction on how they can best affect the outcome of elections, many of the target groups are becoming increasingly so-

phisticated in their approach."

Anderson added, "It is made clear that no campaign will be deemed viable or considered for support without a plan that includes coalitions."

Thompson Committee Democrats will argue in their final report to be released in January, that this represents illegal coordination between the GOP and outside organizations.

RNC's May dismissed suggestions of illegality. "The suggestions here is some of these groups needed direction," he said. "It is not clear from this memo whether the RNC provided that direction or not, nor is there any suggestion that it did so outside the limits of the law. I would assume that there are kinds of guidance that the RNC is allowed to provide, and there is no suggestion that anything that is prohibited was provided."

The coalition manual also lists the Christian Coalition and NRTL, as well as Citizens for a Sound Economy and Americans for Tax Reform (ATR), as "groups who have been the most active in encouraging their constituents to support Republican candidates."

Sen. Carl Levin (D-Mich.) recently charged that the RNC gave \$4.6 million to ATR and coordinated how the money was spent. May said such charges were merely a diversionary tactic by Democrats anxious to distract the public from their own wrongdoing.

"We support like-minded groups within the parameters of the law," he said. "None of these memos that I have seen suggest anything other than that despite attempts to distort their content."